### OFFICIAL FILE

# ORIGINAL

## ILLINOIS COMMERCE COMMISSION STATE OF ILLINOIS

| IN RE ENBRIDGE PIPELINE ILLINOIS LLC.            | ) | 07-0446 | CHIEF CLERK'S OFFICE |
|--|---|---------|----------------------|
| Petition pursuant to Section 8-406, 8-503,       | ) |         |                      |
| 8-509, 13-403, 13-404, 13-405, 15-101, 15.401,   | ) |         |                      |
| 16-108, 16-115, 19-110, 21-401, of the Public    | ) |         |                      |
| Utilities Act for a certificate by pipeline, and | ) |         |                      |
| for entry of an order authorizing and            | ) |         |                      |
| directing construction and operation             | ) |         |                      |
| of a petroleum pipeline and granting authority   | ) |         |                      |
| to exercise eminent domain                       | ) |         |                      |

#### PETITION TO INTERVENE

NOW COMES Sohn Kle', by and through his/her/their attorney, Law Offices of Robert Dodd and Associates, LLC, and respectfully request(s) leave to Intervene in the above-referenced matter. In support of said petition, petitioner states as follows:

1. Petitioners' Name(s), address ad phone number:

John Klein 286 N. 1600 ERd Rosamond IL 62083 \$ 217-562-2221

2. Petitioners' Attorney:

Robert J. Beyers
Law Offices of Robert Dodd and Associates, LLC
303 S. Mattis, ste 201
Chase Bank Building
Champaign, IL 61821
(217) 356-6363
(217) 355-1358
e-mail: rjbeyers@doddlaw.net

- 3. Petitioner(s) is/are individuals residing in Christian County,
  Illinois, and owners of real estate in County,
  said real estate being in the path of the proposed pipeline route.
- 4. Petitioner(s) seek to intervene herein, and be treated as a party to these proceedings.
- 5. Petitioner(s) seek such affirmative relief as may be just and reasonable after the presentation of evidence herein.
- 6. Petitioner(s) agree to accept service by electronic means upon their attorney herein at the address listed above.

WHEREFORE, Petitioner(s), respectfully pray that the Illinois Commerce Commission grant this Petition to Intervene, and for such other and further relief as may be just and reasonable under the circumstances.

Respectfully Submitted,

By, Robert J. Beyers, member of Law

John Klein

Offices of Robert Dodd and Associates, LLC

Attorney for Petitioner(s)

Robert J. Beyers
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303 S. Mattis, ste 201
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(217) 356-6363
(217) 355-1358

e-mail: ribevers@doddlaw.net

#### **VERIFICATION**

| STATE OF ILLINOIS   | ) |    |
|---------------------|---|----|
|                     | ) | SS |
| COUNTY OF CHAMPAIGN | ) |    |

Robert Beyers, upon his oath being first duly sworn, states that he is the attorney for Petitioner(s) seeking leave to intervene and has read the foregoing Petition, is familiar with the facts stated therein, and the same are true and correct to the best of his information, knowledge and belief.

Robert J. Beyers

OFFICIAL SEAL STEVIE L. COLEMAN Notary Public - State of Illinois My Commission Expires Feb 07, 2011

Robert J. Beyers

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#### CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing **Petition to Intervene** was served upon:

Larry Jones, Esq. Administrative Law Judge Illinois Commerce Commission 527 East Capitol Springfield, IL 62701

James Adams Adams Land Corp. 20365 E. 1200 North Road Bloomington, IL 61704

Gerald Ambrose, Esq. Attorney for Applicant Sidley Austin, LLP One S. Dearborn Chicago, IL 60603

Mary Babb 1632 N. Towanda Barnes Road Normal, IL 61761

John L. Benjamin 2375 Interlackin Circle Cleveland, TN 37312

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Attorney for Interveners
The Law Office of Mercer Turner
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Thomas J. Healey, Esq. Counsel - Regulatory Illinois Central Railroad Company 17641 S. Ashland Avenue Homewood, IL 60430

Craig R. Hedin, Esq.
Attorney for Illinois Oil & Gas Association
Campbell Black Carnine Hedin et al.
P.O. Drawer C, 108 S. 9<sup>th</sup> Street
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Andrew Holstine, Esq. Attorney for Interveners The Wochner Law Firm 707 Skokie Blvd. Ste. 500 Northbrook, IL 60062

William J. Holstine Trustee of Alice E. Temple Trust c/o Hertz Farm Management P.O. Box 500 Nevada, IL 50201

Joel W. Kanvik, Esq. Senior Counsel Enbridge Energy Company, Inc. 1100 Louisiana Houston, TX 77002

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Thomas J. Pliura, Esq. Attorney for Interveners Law Offices of Thomas J. Pliura P.O. Box 130 LeRoy, IL 61752

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Jon Robinson, Esq. Attorney for Interveners Bolen Robinson & Ellis, LLP 202 S. Franklin Street, 2<sup>nd</sup> Floor Decatur, IL 62523

Eric T. Ruud, Esq. Civil Division, McLean County State's Attorney's Office P.O. Box 2400 115 E. Washington Street, Ste. 401 Bloomington, IL 61702

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Janis Von Qualen, Esq. Office of General Counsel Illinois Commerce Commission 527 E. Capitol Avenue Springfield, IL 62701 Elliott M. Hedin, Esq Brown, Hay & Stephens, LLP 205 South Fifth Street, Suite 700 Springfield, IL 62705

Hunt Henderson 112 East Center Street LeRoy, IL 61752

by enclosing the same in an envelope addressed to such party at the above address, with postage fully prepaid, and by depositing said envelope in the U.S. Post Office mailbox in Springfield, IL on this 26<sup>th</sup> day of October, 2007.

ROBERT DODD

& ASSOCIATES, P.C.
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